

II. Comment Received and Response to Comments

[Note: Changes to be made to Draft EIS text are presented as ~~strikeout~~ for removed text and underline for new or replacement text.]

Comment Letter 1. United States Environmental Protection Agency, San Francisco, CA.
Lisa B. Hanf, Manager, Federal Activities Office.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-1901

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April 15, 2004

Don Neubacher, Superintendent
Point Reyes National Seashore
Point Reyes, CA 94956

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Subject: Draft Fire Management Plan and Draft Environmental Impact Statement (DEIS) for Point Reyes National Seashore and North District of Golden Gate National Recreation Area [CEQ #040066]

Dear Mr. Neubacher:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

We have rated this DEIS as LO -- "Lack of Objections" (see enclosed "Summary of Rating Definitions"). Alternative C is the National Park Service's preferred alternative because it would involve increased efforts to enhance natural resources while reducing hazardous fuels. While we support this alternative, we have a few additional recommendations.

**Comment
1-1**

The DEIS indicates that all watersheds sampled for the Point Reyes National Seashore Water Quality Monitoring Report had total suspended solids that exceed the recommended standard. Furthermore, Tomales Bay and Lagunitas Creek and Walker Creek watersheds are listed as impaired waters under Clean Water Act Section 303(d). It is unclear from the DEIS what specific measures will be taken to improve water quality in these watersheds. We recommend that your office work closely with the California Regional Water Quality Control Board (CRWQCB) to develop specific management measures that will not only offset fire management impacts, but actually improve water quality in these watersheds. These measures should be described in the Final Environmental Impact Statement (FEIS).

**Comment
1-2**

The CRWQCB recently released the proposed total maximum daily load (TMDL) and implementation strategy for pathogens in Tomales Bay, and will be developing and adopting TMDLs and their implementation plans over the next several years for the other pollutants impairing Tomales Bay, Lagunitas Creek and Walker Creek. We recommend that your office work closely with the CRWQCB as you develop individual bum plans to ensure consistency with the TMDL implementation plans as they are developed for these impaired watersheds.

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Comment 1-1. In light of exceedences of levels of total dissolved solids (TSS) noted in the DEIS for PRNS watershed, the US EPA recommends that NPS work closely with the RWQCB and develop specific management measures to offset potential effects of fire management actions and to improve water quality overall.

Response to Comment 1- 1. The NPS is working in conjunction with the RWQCB, and in partnership with ranchers leasing lands within PRNS, to implement agricultural improvements aimed at reducing impacts on water quality. The park and leaseholders have developed several initiatives to reduce the levels of TSS and other pollutants and correct source areas for erosion on the ranchlands. Examples of these initiatives include the McClure diary barn, funded entirely by the leaseholder, which will house their herd during the winter, permitting their removal from several open pastures during rainy season. On this and other ranches, PRNS has fenced cattle out of creek channels, seasonal drainages and wetlands. On the Stewart Ranch, a grassed buffer strip was construction between high use horse pens and Olema Creek to filter out sediment from runoff. Sediment basins were constructed at the Nunes and Giacomini Ranches to trap runoff from the concentrated use areas of the ranches and avoid deposition of the runoff into creeks and drainages.

Comment 1-2. US EPA recommends that the NPS work with RWQCB to assure that FMP actions not only offset potential project affects but work to improve water quality in the Tomales Bay, Lagunitas Creek and Walker Creek watersheds. The NPS should assure that prescribed burn plans remain consistent with the Total Maximum Daily Level (TMDL) implementation plans currently being developed.

Response to Comment 1-2. Mitigation measures to protect water quality and water resources are listed in the Draft EIS on pages 57-58. Measure W-1 calls for a review of the erosion control plan for each prescribed burn. In response to Comment 1-2, the following text change will be made to Mitigation Measure W- 1 in the Final EIS:

W-1. Individual burn plans will ~~would~~ be written with enough detail to determine the extent of erosion within the burn area due to a) the prescribed burn and/or, b) mechanical treatments. Subject matter experts will ~~would~~ determine if the erosion control plan submitted is sufficient to prevent long-term moderate or major impacts to the water resources and water quality and will assure project compliance with the TDML implementation plans for Tomales Bay, Lagunitas Creek and Walker Creek, according to availability through adoption by the EPA. Strategies to minimize erosion and sediment transport to water resources associated with prescribed burning include avoiding overly steep slopes, timing burns to minimize erosion potential, or using erosion control devices after bums. Strategies to minimize erosion and sediment transport to water resources associated with mechanical treatment include avoiding overly steep slopes, avoiding scraping or clearing to bare mineral soil (leave duff layer), or installing erosion control devices as part of mechanical treatment (if necessary).

Comment
1-3

The DEIS indicates that your office initiated consultation with the U.S. Fish and Wildlife Service in 2001 for this fire management plan. We recommend that the biological opinion for this plan be included in the FEIS.

We appreciate the opportunity to review this DEIS and request a copy of the FEIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3854, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,



Lisa B. Hanf, Manager
Federal Activities Office

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Enclosure

Comment 1-3. US EPA recommends that the biological opinion from the US Fish and Wildlife Service for the PRNS FMP be included in the FEIS.

Response to Comment 1-3. The biological opinions received from the US Fish and Wildlife Service and the National Oceanic and Atmospheric Administration on the FMP are included in this Final EIS. The biological opinions present the conclusions of these agencies on the potential affect of the FMP on species listed by the federal government under the Endangered Species Act.